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19 Attorneys for Defendants L'ORÉAL
20 USA, INC. and MAYBELLINE LLC

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA

23 LIAT ORSHANSKY, on behalf of
24 herself and others similarly situated,
25
26 Plaintiffs,

27 vs.

28 L'OREAL USA, INC. , a Delaware
corporation; MAYBELLINE, LLC, a
New York limited liability company
dba MAYBELLINE, NEW YORK,

Defendants.

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CASE NO. 3:12-CV-06342-CRB

**DECLARATION OF ADAM
BLUMENKRANTZ IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO STAY DEADLINES**

JUDGE: Hon. Charles R. Breyer

1 I, Adam Blumenkrantz, declare:

2 1. I am an attorney licensed to practice in the courts of the State of New
3 York and an associate at Patterson Belknap Webb & Tyler LLP, counsel for
4 Defendants in this case and in the three other matters described below. I have
5 personal knowledge of the matters stated herein and could and would testify
6 competently thereto under oath if required.

7 2. In addition to this action, there currently are three other putative class
8 action suits pending against Defendants, specifically Maybelline LLC, in three
9 other federal jurisdictions.

10 3. The first action is *Leebove, et al. v. Maybelline, LLC*, Case No. 12-
11 7146 (JGK) (S.D.N.Y), filed in the Southern District of New York on September
12 12, 2012. In this action, Plaintiffs raise deceptive practice claims under various
13 state statutes as well as other common law causes of action, all related to the
14 SuperStay 10HR Stain Gloss and SuperStay 14HR Lipstick products. Plaintiffs
15 seek certification of a nationwide class of purchasers of such products, as well as
16 sub-classes of purchasers from Michigan, New York and New Jersey. Attached as
17 Exhibit A is a true and correct copy of the current operative complaint filed in
18 *Leebove, et al. v. Maybelline, LLC*.

19 4. The second action is *Algarin v. Maybelline, LLC*, Case No. 12-cv-3000
20 (AJB) (DHB) (S.D. Cal.), filed in the Southern District of California on December
21 18, 2012. Plaintiff alleges that Defendant violated various California state statutes
22 and breached an express warranty, all in connection with its marketing and
23 promotion of the SuperStay 24 Lipcolor product. Plaintiff seeks certification of a
24 multi-state class of purchasers in California and in other "states with similar laws,"
25 as well as a California-only sub-class. Attached as Exhibit B is a true and correct
26 copy of the current operative complaint filed in *Algarin v. Maybelline, LLC*.

8 I declare under penalty of perjury that this declaration was executed this
9 20th day of March at New York, New York.


Adam Blumenkrantz